

1 MINTZ LEVIN COHN FERRIS  
2 GLOVSKY AND POPEO, P.C.  
3 Andrew D. Skale (211096)  
4 ADSkale@mintz.com  
5 Laura Franco (186765)  
6 LFranco@mintz.com  
7 Anthony J. Viola (*pro hac vice*)  
8 AJViola@mintz.com  
9 Kara M. Cormier (*pro hac vice*)  
10 KMCormier@mintz.com  
11 44 Montgomery Street, 36th Floor  
12 San Francisco, CA 94104  
13 Telephone: 415.432.6000

14 LWD ADVISORS, INC.  
15 Jeff Hyman (171896)  
16 jeff@lwdadvisors.com  
17 700 El Camino Real Suite 120 #1310  
18 Menlo Park CA 94025  
19 Telephone: 650.219.4229

20 Attorneys for Plaintiff  
21 IYO, INC.

22 UNITED STATES DISTRICT COURT  
23  
24 NORTHERN DISTRICT OF CALIFORNIA  
25  
26 SAN FRANCISCO DIVISION  
27

28 IYO, INC.,

Plaintiff,

v.

IO PRODUCTS, INC., OPENAI, INC.,  
OPENAI, LLC, SAM ALTMAN, and SIR  
JONATHAN PAUL IVE,

Defendants.

Case No. 3:25-cv-4861-TLT

**NOTICE OF POTENTIALLY  
RELATED CASE**

Case Assigned to Hon. Trina L. Thompson  
Courtroom 9

Complaint Filed: June 9, 2025  
Trial: January 10, 2028

**TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

PLEASE TAKE NOTICE that Plaintiff IYO, Inc. ("Plaintiff") hereby provides notice of the following potentially<sup>1</sup> related case:

**Case name:** *IYO Inc. v. Dan Sargent and Does 1-10*

**Docket:** CGC-25-627029

**Court location:** Superior Court of California, County of San Francisco

**Status of the case:** Motion for TRO and PI pending

Although none of the Defendants in this case are currently parties to the above-identified action, which involves different claims, Plaintiff lists it in an abundance of caution.

Dated: July 15, 2025

Respectfully submitted,

MINTZ LEVIN COHN FERRIS  
GLOVSKY AND POPEO, P.C.

By: /s/ Andrew D. Skale

Andrew D. Skale (211096)

Laura Franco (186765)

Valerie Phan (306503)

Anthony J. Viola (*pro hac vice*)

Kara M. Cormier (*pro hac vice*)

LWD ADVISORS, INC.

Jeff Hyman (171896)

Attorneys for Plaintiff IYO, Inc.

<sup>1</sup> Local Rule 3-12 provides: "An action is related to another when: (1) The actions concern substantially the same parties, property, transaction, or event; and (2) It appears likely that there will be an unduly burdensome duplication of labor and expense or conflicting results if the cases are conducted before different Judges."